

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CARMEN MARIA NAVARRO FLORES

DEBTOR

CASE NO 15-08468-ESL

CHAPTER 13

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN
AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

NOW COMES, CARMEN MARIA NAVARRO FLORES, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a proposed amended Plan, dated February 29, 2016, herewith and attached to this motion.

2. This proposed amended Plan is to correct the balance owed to secured creditor Rushmore Loan Management Services, as appears on claim 3-1, and to include step-up payment since maturity date of retirement loan falls on month 40 of Plan's payment period.

WHEREFORE, debtor respectfully requests the confirmation of the requested amended Plan, dated February 29, 2016.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal

Page -2-
Amended Chapter 13 Plan
Case no. 15-08468-ESL13

Service copy of this motion to the following non CM/ECF participants: debtor, Carmen Maria Navarro Flores, and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 29th day of February, 2016.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726
TEL. NO. (787) 744-7699
EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico, San Juan Division

IN RE:

Case No. **3:15-bk-8468**

NAVARRO FLORES, CARMEN MARIA

Debtor(s)

Chapter **13**

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☐ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		<input checked="" type="checkbox"/> AMENDED PLAN DATED: 2/29/2016 Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
I. PAYMENT PLAN SCHEDULE		II. DISBURSEMENT SCHEDULE	
$\$ \underline{160.00} \times \underline{40} = \$ \underline{6,400.00}$ $\$ \underline{220.00} \times \underline{20} = \$ \underline{4,400.00}$ $\$ \underline{\hspace{1cm}} \times \underline{\hspace{1cm}} = \$ \underline{\hspace{1cm}}$ $\$ \underline{\hspace{1cm}} \times \underline{\hspace{1cm}} = \$ \underline{\hspace{1cm}}$ $\$ \underline{\hspace{1cm}} \times \underline{\hspace{1cm}} = \$ \underline{\hspace{1cm}}$ TOTAL: \$ 10,800.00		A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. Rushmore Loan Mgr Cr. _____ # 102800000794 # _____ \$ 5,472.97 \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: AEELA 5. <input type="checkbox"/> Other: _____ 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: Sistema De Retiro Rushmore Loan Mgr	
Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: <input type="checkbox"/> Sale of Property identified as follows: _____ <input type="checkbox"/> Other: _____ Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____		C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.	
PROPOSED BASE: \$ 10,800.00		OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."	
III. ATTORNEY'S FEES (Treated as § 507 Priorities) Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ 2,868.00			
Signed: <u>/s/ CARMEN MARIA NAVARRO FLORES</u> Debtor Joint Debtor			

Attorney for Debtor **RFigueroa Carrasquillo Law Office PSC**

Phone: **(787) 744-7699**

CHAPTER 13 PAYMENT PLAN

Label Matrix for local noticing 0104-3 Case 15-08468-ESL13 District of Puerto Rico Old San Juan Mon Feb 29 11:55:01 AST 2016 AEELA PO Box 364508 San Juan, PR 00936-4508	Rushmore Loan Management Services as service Fiddler Gonzalez & Rodriguez PSC P.O. Box 363507 San Juan, PR 00936-3507 Apx Vivint 62992 Collections Center Dr. Chicago, IL 60693-0629	US Bankruptcy Court District of P.R. Jose V Toledo Fed Bldg & US Courthouse 300 Recinto Sur Street, Room 109 San Juan, PR 00901-1964 At T Mobility Po Box 981008 Boston, MA 02298-1008
Att Services 103 Ortegon St Guaynabo, PR 00966-2505	BANCO POPULAR DE PR BANKRUPTCY DEPARTMENT PO BOX 366818 SAN JUAN, PR 00936-6818	Citibank South Dakota N.a. 2365 Northside Dri San Diego, CA 92108-2709
Claro Po Box 360998 San Juan, PR 00936-0998	Eos Cca Po Box 981008 Boston, MA 02298-1008	Luis R. Rivera Santos, Esq. Law Affairs, PSC Ave. Pino H-23 Villa Turabo Caguas, PR 00725-6146
Midland Credit Management, Inc. as agent for Midland Funding LLC PO Box 2011 Warren, MI 48090-2011	Midland Funding 2365 Northside Dri San Diego, CA 92108-2709	Operating Partners CO LLC PO Box 194499 San Juan, PR 00919-4499
Rushmore Loan Management servicing Roosevelt PR 00922	Rushmore Loan Mgmt Ser 15480 Laguna Canyon Rd S Irvine, CA 92618-2132	Sistema De Retiro PO Box 42003 San Juan, PR 00940-2203
(p)C O AMERICAN INFOSOURCE LP 4515 N SANTA FE AVE OKLAHOMA CITY OK 73118-7901	Williams & Rivera Liti 2100 Main St #350 Irvine, CA 92614-6265	CARMEN MARIA NAVARRO FLORES URB IDAMARIS GARDENS D-21 MIGUEL A GOMEZ ST CAGUAS, PR 00727-5720
JOSE RAMON CARRION MORALES PO BOX 9023884 SAN JUAN, PR 00902-3884	MONSITA LECAROS ARRIBAS OFFICE OF THE US TRUSTEE (UST) OCHOA BUILDING 500 TANCA STREET SUITE 301 SAN JUAN, PR 00901	ROBERTO FIGUEROA CARRASQUILLO PO BOX 186 CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

T-mobile 12920 Se 38th Stre Bellevue, WA 98006	End of Label Matrix Mailable recipients 23 Bypassed recipients 0 Total 23
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